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9	Attorneys for Defendant Pixar			
10	[Additional counsel listed on signature page]			
11	UNITED STATES DISTRICT COURT			
12	NORTHERN DISTRICT OF CALIFORNIA			
13	SAN JOSE DIVISION			
14				
15	IN RE: HIGH-TECH EMPLOYEE	Master Docket No. 11-CV-2509-LHK		
16	ANTITRUST LITIGATION  THIS DOCUMENT RELATES TO:	STIPULATION AND [PROPOSED] ORDER REGARDING AMENDING		
17	All Actions	ANSWERS AND AFFIRMATIVE DEFENSES		
18	All Actions	DEFENSES		
19	This Stimulation and Duamass d Ondon	is automadinate by and among the neutice to the above		
<ul><li>20</li><li>21</li></ul>	This Stipulation and Proposed Order is entered into by and among the parties to the abov			
22	captioned actions.  WHEREAS on May 21, 2012, Defe	andants filed answers to the Consolidated Amended		
23	WHEREAS, on May 21, 2012, Defendants filed answers to the Consolidated Amended			
24	Complaint (Dkt Nos. 126, 127, 128, 129, 130, 131 & 132); and  WHEREAS, on June 7, 2012. Plaintiffs wrote to Defendants claiming various.			
25	<b>WHEREAS</b> , on June 7, 2012, Plaintiffs wrote to Defendants claiming various deficiencies with respect to Defendants' affirmative defenses:			
26	The parties agree as follows and request that the Court enter an Order approving this			
27	Stipulation.			
28				

1	1. Defendants in the above-captioned cases shall have 21 days from the date of this		
2	Stipulation to file amended answers and affirmative defenses. Defendants' amended answers and		
3	affirmative defenses shall not include any new affirmative defenses. Without conceding that		
4	Plaintiffs' arguments have merit, Defendants agree to consider Plaintiffs' arguments in an effort		
5	to avoid motions practice.		
6	2. Plaintiffs in the above-captioned cases shall have 21 days from the filing of each		
7	Defendant's amended answer and affirmative defenses to seek relief pursuant to Rule 12(f).		
8	3. Plaintiffs acknowledge that this Stipulation shall not foreclose Defendants from		
9	seeking leave to amend or add affirmative defenses or specific denials after Defendants have filed		
10	their amended answers and affirmative defenses.		
11	Datada Juna 14 2012 COVINCTON & DUDI INC LLD		
12	Dated: June 14, 2012 COVINGTON & BURLING LLP		
13	By: /s/ Emily Johnson Henn		
14	•		
15	Robert T. Haslam, III Emily Johnson Henn 333 Twin Dolphin Drive, Suite 700		
16	333 Twin Dolphin Drive, Suite 700 Redwood City, CA 94065 Telephone: (650) 632-4700		
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20	Telephone: (202) 662-6000 Facsimile: (202) 662-6291		
21	Attorneys for Defendant PIXAR		
22	Thiorneys for Defendin 11201K		
23			
24			
25			
26			
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28			

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1	Dated: June 14, 2012	O'MELVENY & MYERS LLP
2		
3		By: /s/ Michael F. Tubach
4		George Riley
5		Michael F. Tubach Lisa Chen
6		Christina J. Brown Two Embarcadero Center, 28th Floor
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9		Attorneys for Defendant APPLE INC.
10	Dated: June 14, 2012	KEKER & VAN NEST LLP
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12		By: /s/ Daniel Purcell
13		John W. Keker
14		Daniel Purcell Eugene M. Page
15		Paula L. Blizzard 710 Sansome Street
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17		Facsimile: (415) 397-7188
18		Attorneys for Defendant LUCASFILM LTD.
19	Dated: June 14, 2012	JONES DAY
20		
21		By: /s/ David C. Kiernan
22		Robert A. Mittelstaedt
23		Craig A. Waldman David C. Kiernan
24		Catherine T. Broderick Craig E. Stewart
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26		Telephone: (415) 626-3939 Facsimile: (415) 875-5700
27		Attorneys for Defendant ADOBE SYSTEMS, INC.
28		Anorneys joi Dejenuum ADOBE SISIEMS, INC.
		STIPULATION AND [PROPOSED] ORDER - 3 - MASTER DOCKET NO. 11-CV-2509-LHK

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1	Dated: June 14, 2012	JONES DAY
2		<b>D</b> / /
3		By: /s/ David C. Kiernan
4		Robert A. Mittelstaedt
5		Craig A. Waldman David C. Kiernan Catherine T. Broderick
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9		Attorneys for Defendant INTUIT INC.
10	Dated: June 14, 2012	MAYER BROWN LLP
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12		By: /s/ Lee H. Rubin
13		Lee H. Rubin
14		Edward D. Johnson Donald M. Falk
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19	Dated: June 14, 2012	BINGHAM McCUTCHEN LLP
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22		Donn P. Pickett
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26		Attorneys for Defendant INTEL CORPORATION
27		
28		
		STIPULATION AND [PROPOSED] ORD  A MASTER DOCKET NO. 11-CV-2509.1

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1		LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
2	Dated: June 14, 2012	D /a/
3	Dated. Julie 14, 2012	By: /s/ Kelly M. Dermody
4		Richard M. Heimann (State Bar No. 63607)
5		Kelly M. Dermody (State Bar No. 171716) Eric B. Fastiff (State Bar No. 182260)
6		Brendan Glackin (State Bar No. 199643) Dean Harvey (State Bar No. 250298)
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9		Telephone: 415.956.1000 Facsimile: 415.956.1008
10		Co- Lead Counsel for Plaintiff Class
11	Dated: June 14, 201	SAVERI LAW FIRM
12		
13		By: /s/ Joseph R. Saveri
14		Joseph R. Saveri (State Bar No. 130064)
15		SAVERI LAW FIRM 255 California, Suite 450
16		San Francisco, California 94111 Telephone: 415.500.6800
17		Facsimile: 415.500.6803
18		Co- Lead Counsel for Plaintiff Class
19		
20	ATTESTATION: Pursuant to	General Order 45, Part X-B, the filer attests that concurrence in
21	the filing of this document has	been obtained from all signatories.
22		
23	SO ORDERED.	
24		
25	Dated: 20	)12
26		By:
27		Honorable Lucy H. Koh United States District Judge
28		
		STIPULATION AND [PROPOSED] ORDER